

Hal Taylor, Esq.
Of Counsel, Olinsky Law Group
NV Bar No.: 4399
2551 West Lakeridge Shores
Reno, NV 89509
Tel: (775) 825-2223
Fax: (775) 329-1113
Email: HalTaylorLawyer@gbis.com

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KIM HENSLEY,)	
)	
Plaintiff,)	CASE NO. 2:21-cv-00508-VCF
)	
v.)	
)	CONSENT MOTION
)	FOR EXTENSION OF TIME TO FILE
KILOLO KIJAKAZI ¹ ,)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
)	

Plaintiff, Kim Hensley, by her attorney, Hal Taylor, Esq., Of Counsel, Olinsky Law Group, hereby moves for a sixty-day (60) extension of time to file Plaintiff's Opening Brief. Plaintiff's opening brief is currently due to be filed October 4, 2021.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel. Wherefore, Plaintiff requests an extension from October 4, 2021 up to and including December

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on 7/9/2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted for Andrew Saul as the Defendant in this suit.

1 3, 2021 to file her brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who
2 kindly has no objection to this request.

3 Dated this 26th day of September, 2021.

4 Respectfully submitted,

5 /s/Hal Taylor

6 Hal Taylor, Esq.

7 Of Counsel, Olinsky Law Group

8 NV Bar No.: 4399

9 223 Marsh Ave.

10 Reno, NV 89509

11 Tel: (775) 825-2223

12 Fax: (775) 329-1113

13 HalTaylorLawyer@GBIS.com

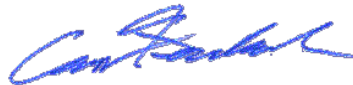
14 **Plaintiff's Certificate of Service:**

15 I certify that I caused the Motion for Extension of Time to be served today, September
16 26, 2021, by CMECF to Allison Cheung, Esq. and Blaine T. Welsh, Esq., who are filing users of
17 the CM/ECF system.

18 /s/Hal Taylor

19 Hal Taylor, Esq.

20 IT IS SO ORDERED.

21 

22 Cam Ferenbach

23 United States Magistrate Judge

24 9-27-2021

25 DATED _____